BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001 RECEIVED

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY DBP/USPS-90 (January 7, 2002)

The United States Postal Service hereby moves for late acceptance of its

Objection to interrogatory DBP/USPS-90, filed on December 17, 2001. The Objection
was due on December 27, 2001 and is thus 6 business days late. The undersigned
counsel has been preparing for oral hearing and inadvertently missed the filing date.

The Postal Service regrets any inconvenience but does not believe that any party has
been prejudiced by this delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3078, Fax –5402 January 7, 2002

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 January 7, 2002